IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS MIDLAND/ODESSA DIVISION

VIRTAMOVE, CORP.,

Plaintiff,

v.

Case No. 7:24-CV-00030-ADA-DTG

AMAZON.COM, INC.; AMAZON.COM SERVICES LLC; AND AMAZON WEB SERVICES, INC.,

Defendants.

JOINT MOTION FOR EXTENSION OF TIME FOR PLAINTIFF TO ANSWER OR OTHERWISE RESPOND TO DEFENDANTS' COUNTERCLAIMS

Plaintiff VirtaMove Corp. ("Plaintiff") and Defendants Amazon.com, Inc., Amazon.com Services, LLC and Amazon Web Services, Inc. ("Defendants") hereby jointly move for a one-week extension of time for Plaintiff to answer or otherwise respond to Defendants' Second Amended Counterclaims (Dkt. 61), and a one-week extension of time for Defendants to oppose any motion to dismiss those counterclaims.

Plaintiff's deadline to answer or otherwise respond to the counterclaims is currently October 10, 2024 and, with this one-week extension, the deadline would be October 17, 2024. This extension is necessary because Plaintiff is investigating new allegations raised for the first time in the counterclaims. In the event Plaintiff moves to dismiss the counterclaims, Defendants' deadline to file its opposition would be October 31, 2024, and with the granting of this Motion, the deadline for the opposition would be extended one week to November 7, 2024.

Counsel for the parties have conferred and all parties stipulate to this extension.

Accordingly, the parties request that the Court grant the motion and enter the attached proposed Order.

Dated: October 9, 2024

By: /s/ Daniel B. Kolko

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on October 9, 2024, a true and correct copy of the foregoing document was electronically filed with the Court and served on all parties of record via the Court's CM/ECF system.

/s/ Daniel Kolko	
Daniel Kolko	